

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GOVERNOR ANDREW M. CUOMO,

Movant,

v.

OFFICE OF THE NEW YORK STATE
ATTORNEY GENERAL,

Respondent.

Case No. 22-mc-03044 (LDH) (TAM)

**DECLARATION OF THERESA TRZASKOMA IN SUPPORT OF
GOVERNOR CUOMO'S MOTION FOR RECONSIDERATION OF
THE JULY 21 DISCOVERY ORDER**

I, THERESA TRZASKOMA, an attorney admitted to practice before this Court, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm Sher Tremonte LLP, counsel to Governor Cuomo in the above-referenced miscellaneous action and in the Trooper 1 Action.

2. I submit this declaration in support of Governor Cuomo's Motion for Reconsideration of the July 21 Discovery Order. I have knowledge of the matters described below.

3. Attached as **Exhibit 1** is a true and correct copy of an email exchange between me and counsel for Trooper 1 (Valdi Licul, John S. Crain), dated July 24, 2023.

4. Attached as **Exhibit 2** are excerpts from the June 1, 2023 deposition of Colonel Jennifer Gottstine in the Trooper 1 Action.

5. Attached as **Exhibit 3** are excerpts from the July 10, 2023 deposition of Ana Liss-Jackson in the Trooper 1 Action.

6. Attached as **Exhibit 4** are excerpts from the June 27, 2023 deposition of James Boyle in the Trooper 1 Action.

7. Attached as **Exhibit 5** is a true and correct copy of text messages exchanged between Trooper 1 and Diane Parrotta, dated May 3, 2023 and May 4, 2023.

Dated: New York, New York
July 31, 2023

/s/ Theresa Trzaskoma
Theresa Trzaskoma